

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK**

In re:

PRIME CAPITAL VENTURES, LLC,

Debtor.

Chapter 11

Case No. 24-11029 (REL)

**LIMITED OBJECTION OF HOGAN LOVELLS US LLP TO
THE DEBTOR'S SECOND AMENDED DISCLOSURE STATEMENT**

Hogan Lovells US, LLP (“Hogan Lovells”), by and through its attorneys, Law Offices of Douglas T. Tabachnik, P.C., as and for its Limited Objection to the Debtor’s Second Amended Disclosure Statement (docket #118), respectfully shows to the Court, as follows:

1. The Second Amended Disclosure Statement contains several inaccurate statements insofar as they relate to the participation and involvement of Hogan Lovells US LLP in these proceedings and the related proceedings that preceded them. The Declaration of Pieter Van Tol, Esq., attached hereto as Exhibit A, addresses these inaccuracies.

2. Along with the mischaracterization and inaccurate portrayal of Hogan Lovells’ participation in these proceedings, the Disclosure Statement improperly downplays potential claims against the alleged creditors that filed the initial unsuccessful involuntary bankruptcy case against the Debtor in 2023. The inaccuracies portrayed by the Debtor tend to argue against the prosecution of claims that the Debtor possesses against the petitioning creditors and that this Court has denied the Debtor permission to abandon. *See docket no. 122.* The denigration of these claims is improper, as the Debtor has not provided a sufficient record to support such a characterization of the claims as

would support abandonment as the Debtor has made, and yet the Debtor has made the denigrating assertions in this Second Amended Disclosure Statement, nevertheless.

3. The Disclosure Statement should be amended accordingly to properly reflect the history of these proceedings and to properly inform creditors of the potential claims of the Debtor against third parties.

WHEREFORE, this Court Should require an appropriate amendment of the Second Amended Disclosure Statement, together with such other and further relief as to this Court seems just, proper, and Equitable.

Dated: February 19, 2025

Respectfully submitted,

/s/ Douglas T. Tabachnik

Douglas T. Tabachnik, Esq.
(admitted in this district)
Law Offices of Douglas T. Tabachnik, P.C.
63 West Main St., Suite C
Freehold, N.J. 07728
(732) 780-2760
dtabachnik@dtlaw.com

Attorneys for Hogan Lovells US LLP